



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**
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May 24, 2006

VIA EMAIL AND USPS

Barbara Anne Sousa
Assistant General Counsel
Verizon Massachusetts
185 Franklin Street, 13th Floor
Boston MA 02110

RE: Petition of the Board of Selectmen of the Town of Middlefield pursuant to
G.L. c. 159, § 24, regarding the quality of Verizon's telephone service,
D.T.E. 06-6

Dear Attorney Sousa:

Enclosed please find the second set of information requests issued by the Department of Telecommunications and Energy ("Department") to Verizon Massachusetts ("Verizon") in the above-captioned matter. Please submit Verizon's responses to the Department and the parties on or before 5:00 p.m, Thursday, June 8, 2006. If you have any questions regarding the information requests, please contact me at 617-305-3561.

Sincerely,

/s/
Carol M. Pieper
Hearing Officer

Encs.

cc: D.T.E. 06-6 service list (w/encs.)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**SECOND SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO VERIZON MASSACHUSETTS, D.T.E. 06-6**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon Massachusetts (“Verizon”) the following Information Requests.

Requests

- DTE-2-1 In response to DTE-1-1 and DTE-1-3, Verizon stated it was unable to provide data related to the nature of trouble reports and the time to clear trouble reports for the Town of Middlefield (“Town” or “Middlefield”) for the past two years because it “would require a time-consuming, dedicated manual work effort to determine whether any such detail exists.” Please provide complete and detailed documentation regarding the manner in which Verizon tracks trouble reports, including a description of the software used by Verizon, the data that is input into the computer program, the manner in which such data is input into the computer, the reports that Verizon automatically generates on a regular basis, and the uses of those reports.
- DTE-2-2 In response to DTE-1-2, the Company provides a percentage of reports per 100 lines for the Town. Please state the number of lines in Middlefield.
- DTE-2-3 In response to DTE-1-2, Verizon provided information through February 2006. Please provide monthly reports for the Town for March 2006, April 2006, and May 2006 (when available).
- DTE-2-4 In response to DTE-1-4, Verizon stated that the Company “captures all trouble reports received by its repair personnel in the Verizon repair call center.” Please clarify whether the repair personnel in the Verizon repair call center receive trouble reports sent through a Berkshire County dispatcher via radio.
- DTE-2-5 In response to DTE-1-11(a), the Company stated that WMEC is responsible for maintenance and replacement of jointly owned poles in the Town. At the public hearing, there was testimony that a Verizon employee condemned a pole in Middlefield (see Tr. at 17). Please state whether Verizon employees are authorized to condemn poles that are not solely-owned by Verizon and for which other companies bear responsibility for maintenance and replacement, and state the applicable guidelines used by Verizon employees.
- DTE-2-6 In response to DTE-1-11(b), the Company stated it “considers customer records proprietary and will disclose that data to the Department only upon express consent of the customer.” Please provide the requested customer records to the Department and accompany the information with a motion for confidential treatment.

DTE-2-7 In response to DTE-1-13, the Company provided a Double Pole Report showing that only one double pole existed in the Town as of April 30, 2006. With respect to this information, please address the following questions:

- (a) Please provide the location of this double pole, state whether Verizon has any pole attachments on the pole that is scheduled for removal, and state the date on which Verizon became aware of this double pole.
- (b) Because Verizon's response that there is only one double pole conflicts with testimony provided at the public hearing that there are numerous double poles throughout the Town (see, e.g., Tr. at 43-44), please provide the documentation upon which Verizon's response that there is only one double pole in Middlefield is based.